



Environmental Management System Procedure

for

**Internal and External Communication
Regarding
EMS and Environmental Practices**

at the

USAG Baumholder

21 November 2005

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Environmental Management System Documentation of the USAG Baumholder

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Environmental Management System (EMS) Procedure for Internal and External Communication Regarding EMS and Environmental Practices at the USAG Baumholder

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23 Nov 2005

References:

- a. Executive Order 13148, *Greening the Government through Environmental Leadership*.
- b. ISO 14001: 2004, *Environmental Management Systems – Specification with Guidance for Use*.
- c. EMS-Procedure # EMS_PBH_02 – *Determining the Significant Environmental Aspects of the Activities, Products and Services of the USAG Baumholder, effective 28 April 2005*.
- d. EMS-Procedure # EMS_PBH_04A – *Developing Environmental Objectives and Targets for the USAG Baumholder, effective 3 Jun 2005*.
- e. EMS-Procedure # EMS_PBH_04B – *Establishing, Implementing and Maintaining Environmental Programs at the USAG Baumholder, effective 3 Jun 2005*.
- f. EMS Procedure # EMS_PBH_05 – *Defining Roles, Responsibility and Authority at the USAG Baumholder, effective 28 Apr 2005*.
- g. EMS Procedure # EMS_PBH_06 – *EMS awareness training at the USAG Baumholder, 28 Apr 05*.
- h. EMS Procedure # EMS_PBH_09 – *Control of Environmentally Relevant Documents of the USAG Baumholder, draft*.
- i. EMS Procedure # EMS_PBH_014 – *Initiating, Documenting, and Implementing Corrective and Preventive Actions to Eliminate Nonconformities with EMS requirements at the USAG Baumholder, 28 Apr 2005*.

1.1 PURPOSE

The purpose of this procedure is to establish formal guidelines for internal and external communication regarding the environmental management system (EMS) and other environmental practices/issues.

1.2 APPLICABILITY

This procedure applies to all personnel working within or on behalf of the USAG Baumholder who are involved in the Garrison's EMS or environmental practices/issues related communication.

1.3 DEFINITIONS

Cross Functional Team (CFT) – A group of individuals from across the Garrison, appointed either by the Garrison Commander or senior leadership, who will coordinate the support necessary for EMS implementation and are responsible for implementing the EMS Garrison -wide.

Communication – Exchange of information using (in this case) verbal or written methods such as meetings, reports, telephone conversations, e-mail, letters, newsletters, websites, press releases,...

DPW EMO – Directorate of Public Works Environmental Management Office.

ECL – EMS Communications Log. Log used for tracking EMS relevant communication.

ECO – Environmental Compliance Officer.

EMS Management Representative (EMSMR) – An individual appointed by the Garrison Commander who, irrespective of other duties, is responsible for the operation of the Garrison's EMS and chairs the Garrison's Cross Functional Team (CFT).

Environmental Aspect – The part of an activity, product, or service that interacts with the environment.

Environmental Impact – Any change to the environment that is caused by an environmental aspect.

Environmental Objective – A higher-level, overall environmental goal, arising from the Environmental policy, that the Garrison sets itself to achieve, and which is quantified where practicable.

Environmental Program – (in the sense of EMS) is a program implemented to use the Garrison's environmental objectives and targets, detailing the responsibilities, means and timeframes by which they shall be achieved.

Environmental Target – A detailed performance requirement, quantified where practicable, applicable to the Garrison or parts thereof that arises from the

environmental objectives and needs to be set and met in order to achieve those objectives.

Environmental Quality Control Committee (EQCC) – A group of individuals that coordinates the activities of the environmental programs covered in AR 200-1. The EQCC members together with the Garrison Commander and the EMO Chief, jointly establish, implement, and execute environmental priorities, policies, strategies, and programs. EQCC members represent the operational, engineering, planning, resource management, legal, medical, and safety interests of the command, including military installation tenant activities. Establishment of EQCC is required by AR 200-1.

External Party – A person, group or organization not working within the installations of the USAG Baumholder and thus not directly causing any of the environmental impacts of the Garrison.

Interested Party – A person, group or organization concerned with or affected by the environmental performance of the Garrison.

NOV – Notice of violation.

PAO – Public Affairs Office.

Preventive/Corrective Action Request (PCAR) – A request submitted using the procedures described in this document to initiate action for addressing an EMS nonconformity.

Quality Assurance (QA) Representative – An individual who independently verifies that the corrective and/or preventive action was completed. The QA Representative may be one of the following: DPW Environmental Management Office staff; a DPW internal auditor; the EMSMR; or a qualified person designated by the EMSMR.

Significant Environmental Aspect – Any environmental aspect that has or can have a significant environmental impact.

Significant Environmental Impact – Any potential significant change to the environment, wholly or partially resulting from the Garrison's activities, products or services.

2 PROCEDURE

2.1 GENERAL

Efficient and effective internal and external communication is critical for environmental management. The DPW EMO will ensure that this SOP is communicated across the Garrison to all parties that may be involved in EMS relevant communications or other communications relevant for environmental management.

All communications deemed relevant for EMS/environmental matters shall be documented to make it verifiable. For example, the key points of verbal communications (like telephone conversations or meetings) should be written down to document them.

Records of communications shall be filed so that they are retrievable. It is recommended to file communications by topic, POC and date. All communications with a value for EMS beyond the day-to-day business shall be included in the EMS document control system (IAW EMS procedure EMS_PBH_09).

The DPW EMO will publish contact data on the EMS webpage to ease EMS related communications.

2.2 DETERMINING APPLICABILITY OF THIS PROCEDURE

This procedure applies for all external and internal communications of the USAG Baumholder that is related to EMS, environmental management or to activities, products or services of the USAG Baumholder that can significantly impact the environment. Examples include:

- Notices of violation of host nation requirements (NOVs),
- Permits/permit applications and host nation authority environmental judgments,
- Environmental non-compliance findings,
- Environmental requests, press requests,
- Collection of statistical data related to environmental performance of the Garrison,
- Communications of workgroups dealing with improving environmental performance of an activity, product or service,
- Roles and responsibilities for environmental measures, and
- Emergency response procedures.

2.3 COMMUNICATING EMS AND ENVIRONMENTAL ISSUES

2.3.1 Requirements

The DPW EMO is responsible for communicating to all affected people the Garrison's EMS. This includes:

- the environmental policy,
- the significant environmental aspects,
- the roles and responsibilities within EMS and the environmental programs,
- EMS awareness training and process specific environmental training,

- the procedure for dealing with environmental incidents and emergency situations,
- the procedure for dealing with non-conformities,
- the procedure for responding to employee and third party concerns,
- the environmental objectives, targets, and programs, and
- monitoring of environmental performance and EMS performance, audit results, and the management review of EMS.

The DPW EMO can request that each unit/organization/contractor appoints an EMS representative (e.g. the ECO) for assistance in this effort.

2.3.2 Communication of environmental policy

ISO 14001 requires that the environmental policy be communicated internally and published externally.

To ensure external communication of the policy, the Garrison will publish the policy on the Garrison website, and communicate to the Public Affairs Office (PAO) and all personnel, that the policy is available. In addition, the DPW EMO will ensure EMS awareness training is provided to all personnel working within the installations of the USAG Baumholder as outlined in EMS-Procedure # EMS_PBH_06.

2.3.3 Communication of other EMS elements and environmental issues via the EMS webpage

ISO 14001 requires the Garrison to publish the environmental policy to the external public. The USAG Baumholder has decided to meet this requirement by using a web page from which the policy can be downloaded.

During the EQCC meeting on 17 August 2005 the decision was made to offer a web page that explains the whole EMS and includes downloadable EMS procedures to the Garrison members and the external public. The EMS web page is intended to increase EMS awareness, ease the implementation of the system, and promote public relations. The web page is published as a part of the overall Garrison web page by the PAO. The DPW EMO provides input for the setup and contents of the page. Force protection concerns are taken into consideration, since the page is available to external parties.

2.4 EXTERNAL COMMUNICATION

2.4.1 General

The Public Affairs Office (PAO) has to be notified regarding all external communications to determine the appropriate way of responding. The PAO shall review all external communications that could potentially cause liabilities prior to issue.

All contacts with host nation authorities concerning topics related to environmental issues should be checked for relevance under this SOP. If deemed relevant, they should be entered into the EMS communications log (ECL) provided by the DPW EMO (see also Appendix B).

Thus, the person in charge for a response must determine the response due date (see chart in Appendix A) based on the urgency of the case and restricted resources; no external

communications shall be delayed to an extent that it could damage public relations, or even worse, relationships with host nation authorities. As a general rule, external communications should be answered within 15 working days.

As a courtesy, external parties should be sent a message by the person in charge for the response, indicating receipt of the communications, and when they may expect an official response.

2.4.2 External parties communication requests

The method to be used is illustrated in Appendix A. Ensure all steps are documented as appropriate.

Before issuing a response, it has to be reviewed for implied legal or safety concerns by the PAO. If necessary, the Office of Staff Judge Advocate (OSJA) and Safety Office (SO) may need to be involved.

2.4.3 Communication with host nation authorities

The DPW EMO chief shall be informed about all communications with host nation authorities concerning environmental matters, such as applications for permits or notice of violations (NOVs). If necessary, or requested by the DPW EMO chief, he/she shall be given the opportunity to provide input to the communications. The DPW EMO chief will keep a list concerning all host nation authority communications that shall be tracked by the DPW EMO.

2.4.4 Routine communications with external parties

All routine communication shall be checked for relevance under this procedure.

Routine communications with external parties include (for this procedure) all communications with parties that can not directly influence the environmental performance of the USAG Baumholder. Meaning, that e.g. reporting of resource use related information to USAREUR headquarters would fall under external communication.

Emergency Preparedness and Response procedures involving external parties such as the local fire department would be routine communications.

2.4.5 Communication with external parties intended to improve public relations

All communications prepared by the DPW EMO intended to improve public relations has to be reviewed by the Public Affairs Office (PAO) prior to issue.

2.5 INTERNAL COMMUNICATION

2.5.1 General

Internal communication principles do not differ from the ones for external communication except the involvement of PAO will not be necessary; therefore, refer to Section 2.4.1.

The main differences between internal and external communications are:

- Internal communication is in general less critical regarding safety and legal concerns.
- Relevant internal environmental communication often is not only aimed to exchange information, but to involve people in tasks that need to be accomplished for environmental reasons.

2.5.2 Internal parties

In the sense of this procedure internal parties are all parties that can directly influence the environmental performance of the USAG Baumholder. Examples include:

- DPW personnel,
- Maintenance personnel, to include contractors,
- Tactical Units,
- Tenant Organizations, such as AAFES or DECA, and
- All contractors when performing on-site work that could impact the environment.

2.5.3 Key internal communication

The DPW EMO shall determine all internal communication that is essential for environmental management, ensure this communication takes place on a regular basis, and is documented. Such key internal communication could include:

- DPW EMO staff meetings,
- Duty assignments,
- Workgroup meetings with other DPW offices,
- Workgroup meetings with the target proponents of the EMS objectives and targets,
- EQCC meetings,
- CFT meetings, and
- Communication concerning activities, products, or services related to Garrison's significant environmental aspects.

2.6 MONITORING

The QA Representative checks on an annual basis, if the internal and external communication complies with this procedure and informs the EMSMR on the results of the assessment. If a non-conformance is identified, a PCAR must be completed as described in EMS procedure EMS_PBH_014 to implement a corrective action.

LIST OF APPENDICES

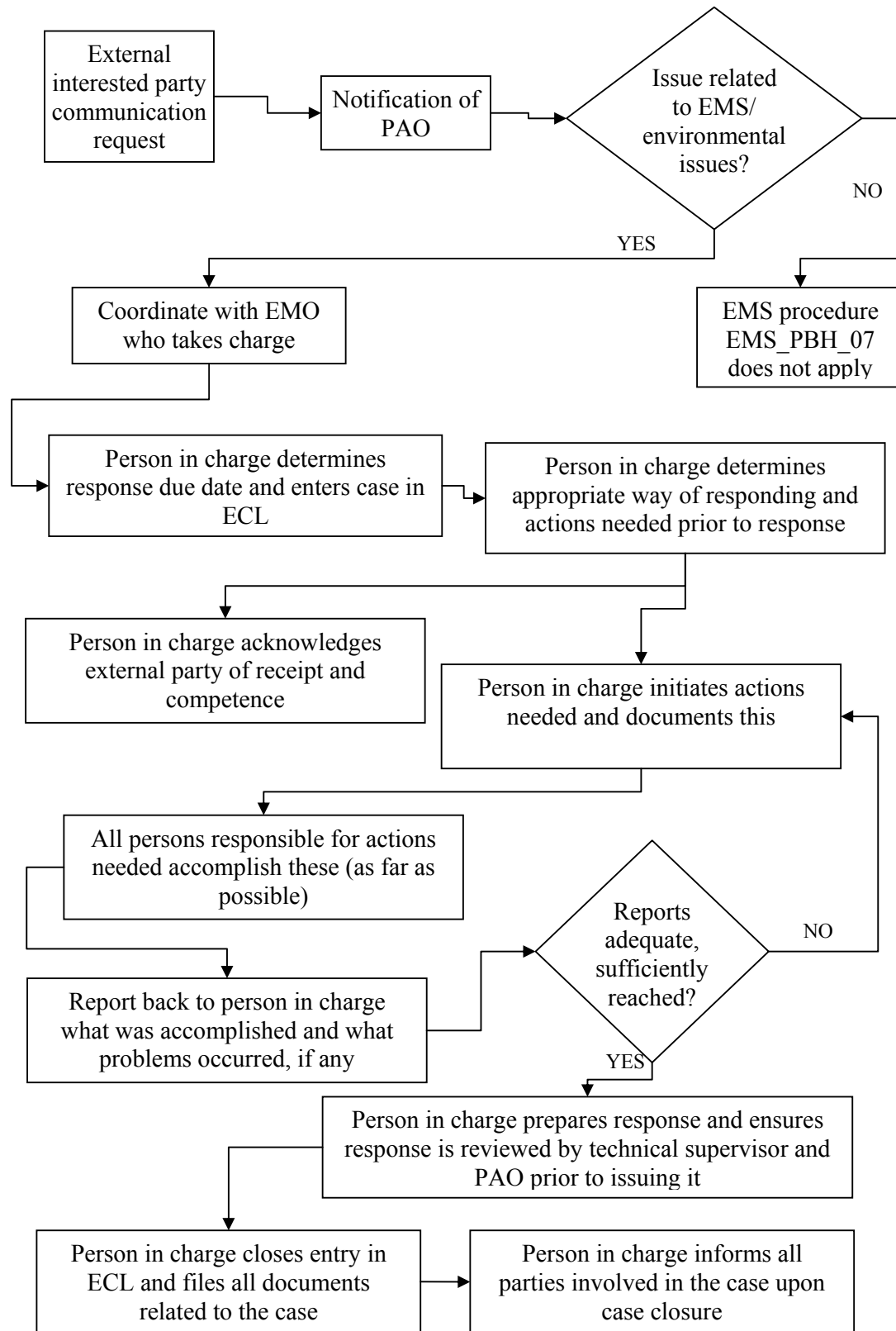
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APPENDIX A

External Parties Communication Requests Flow Chart



APPENDIX A

External Parties Communication Requests Flow Chart



APPENDIX B

USAG Baumholder EMS Communications Log Form

		ENVIRONMENTAL MANAGEMENT SYSTEM			
		USAG BAUMHOLDER			
EMS Communication Log <i>(EMS Form #: EMS_FBH_07_01)</i>					
ECL Item #:	Incoming/ Outgoing Communication (I/O):	Date entered in ECL:	Response due date:	Reviewed by PAO (y/n, date):	Case closure date:
Topic:					
Title of record:					
Date of record:					
Coming from					
Name:					
Organization:					
e-mail:					
DSN:					
Person in charge					
Name:					
Organization:					
e-mail:					
DSN:					
Reviewed by PAO					
Yes/No:	Date:	Remarks:			
Records filed under:					
Additional remarks:					